

REMARKS

This amendment, submitted in response to the Office Action dated June 19, 2003, is believed to be fully responsive to each point of objection raised therein. Accordingly, favorable reconsideration is respectfully requested.

As a preliminary matter, Applicant submits that receipt of the priority document filed on June 7, 2000, has not been acknowledged. Therefore, Applicant respectfully requests that the Examiner acknowledge receipt of the priority document.

Claims 1-20 are pending in the application. The Examiner rejected claims 1-3, 5-8, and 10-20 under 102(e) as being anticipated by Matsuyama (USP 6,330,068). The Examiner has indicated that claims 4 and 9 would be allowed if written in independent form. Applicant submits the following in traversal of the rejection.

Claims 1 and 6

The Examiner maintains Matsuyama discloses a server device that constantly monitors prescribed folders in the server device, citing column 17, lines 30-49 and column 32, lines 15-36 in support. The respective column and lines cited by the Examiner describe a *print server* that periodically monitors an image tile cache file discard time 9005 in the image cache information table 1608 in RAM 2002 in order to delete the row in the image tile cache file discard time which is earlier than the current time. It appears the Examiner is referring to either the image tile cache file discard time, the image cache information table or the RAM for teaching a folder. The cited cache file and memory components of the print server cannot comprise all the aspects of monitoring and execution as claimed because the print server does not act to recognize or respond to a command file.

The Examiner further maintains that when a command file which instructs execution of a designated process is recognized in the prescribed folders, the process instructed by the command file is performed, citing column 17, lines 60 to column 18, lines 30.

The respective column and lines cited by the Examiner describe the response of an *image server* when a client makes a data transmission request. If a client makes a request for image data the image server searches for the requested data in HDD 3009 of the image server. If the data requested is located, the image server prepares for transmission of the data.

Applicant submits that an image tile cache file discard time, an image cache information table, a RAM and request data are not generally recognized as a command *file*.

Furthermore, the Examiner is alternating between aspects of the print server and the image server of Matsuyama, for teaching the elements of the *server* of the present invention. The Examiner refers to elements of an *image server* for teaching a command file which instructs execution of a designated process when the command file is recognized in the prescribed folders, whereas the *print server* was initially cited for teaching a server device with folders which are constantly monitored. Therefore, execution of a designated process is not recognized in the prescribed folders of the print server, but of an image server, which is a completely different server than that which was initially cited by the Examiner. The transfer of data occurring in the image server cannot comprise the monitor and execution as claimed because there is no indication throughout the reference that the image server periodically monitors any folders.

Moreover, the data request instructing execution of a designated process (it appears the Examiner is referring to a data transmission request by a user to the *image server*) is not recognized in the prescribed folders (image tile cache file discard time 9005, the image cache

information table 1608, or the RAM 2002). As previously indicated the image tile cache file discard time 9005, the image cache information table 1608, or the RAM 2002 pertain to the print server and not the image server.

In addition, there is no indication in Matsuyama, that the image server and the print server should be combined to teach the *server* of the present invention. MPEP 2143.01.

For the above reasons, claims 1 and 6 and their dependent claims should be deemed patentable. Since claims 11 and 16 teach similar features, claims 11 and 16 and their dependent claims are patentable for the same reasons.

Claims 2 and 7

The rejection of claims 2 and 7 suffers from the same deficiency indicated above, in that the Examiner is referring to transferring a command file to an *image server* whereas the prescribed folders which are used to recognize the command file are located in the *print server*. Therefore, the command file is not transferred to the print server device as indicated by the Examiner and claims 2 and 7 should be deemed patentable.

Claims 3 and 8

Claims 3 and 8 describe a client server system configures an OPI system, which creates low resolution image data for editing from high resolution image data, etc..

Applicant submits that there is absolutely no indication in Matsuyama of an OPI system. It appears that the Examiner is referring to CPU 1001 for teaching an OPI system. Column 28, lines 8-11. It is clear to one of ordinary skill in the art that merely because a system contains a CPU does not mean that the CPU is an OPI system. If that were the case, then anything with a CPU is an OPI system.

For the above reasons, claims 3 and 8 should be deemed patentable. Since claims 13 and 18 teach similar subject matter, they are patentable for the same reasons.

Claims 11 and 16

Claims 11 and 16 describe a process performing device to perform a process instructed by the command file on the server device when the command file is recognized in the prescribed folders. It appears the Examiner is referring to column 7, lines 43-49 for teaching a process performing device. The respective column and lines cited by the Examiner describe a network interface 1004 of a print controller 103. The network controller controls a data transfer to and from the *print server* and controls and diagnoses data to be transmitted to the network system to interconnect a user terminal and the system.

According to the Examiner's reasoning, the network interface 1004 of the *print server* performs a process instructed by a command file (data request by a client) on the *image server*. Therefore, the Examiner is again being inconsistent. As previously indicated, the Examiner is referring to different elements of both the print server and the image server of Matsuyama in order to teach the elements of the server of the present invention. Mostly likely because neither the print server or the image server alone, teach the elements of the server of the present invention, as indicated above. Therefore, claims 11 and 16 should be deemed patentable.

Applicant has amended claims 1, 6, 11 and 16 to include the language "existence of" as indicated above. See Specification page 20, lines 6-9. Matsuyama does not monitor the existence of a command file, therefore, the present invention is further made patentable over the prior art.

AMENDMENT UNDER 37 C.F.R. § 1.111
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Applicant has added claims 21-35 to provide a more varied scope of protection. Claims 34 and 35 include the subject matter of allowable claims 4 and 9.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

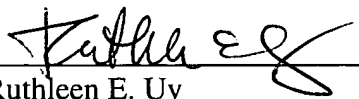
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